

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

KAREN BACKUES KEIL, et al.)	
)	
Plaintiff,)	
)	
v.)	Case No. 18-06074-CV-SJ-BP
)	<i>This motion pertains to:</i>
)	<i>Betz v. Bearden, No. 18-6079</i>
)	<i>Zieser v. Bearden, No. 18-6103</i>
)	<i>Doe v. Bearden, No. 19-cv-6161</i>
EDWARD BEARDEN.,)	
)	
Defendants.)	

**REQUEST FOR WRIT OF
HABEAS CORPUS AD TESTIFICANDUM**

Plaintiffs in the matters above, consolidated for trial, respectfully petition this Court to issue a Motion for a Writ of Habeas Corpus Ad Testificandum for Teri L. Dean. In support of this Petition, Plaintiffs state as follows:

1. This Court has the authority and discretion to issue a writ of habeas corpus ad testificandum where an inmate-witness's testimony is relevant and necessary to the pending action. 28 U.S.C. §§ 1651(a) and 2241(c)(5).
2. Teri Dean, DOC ID 1153665, is currently confined in the Missouri Department of Corrections at Chillicothe Correctional Center, 3151 Litton Rd, Chillicothe, MO 64601.
3. The presence of Teri Dean is necessary to give testimony in this lawsuit.
4. This is an action pursuant to 42 U.S.C. § 1983, in which the Plaintiffs seek compensatory damages and punitive damages against Defendant for violations of their

constitutional rights while acting under color of state law, together with reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988.

5. In summary, Plaintiffs' allegations against Defendant are that the Defendant Corrections Officers harassed, abused, and sexually assaulted them during their confinement at the Chillicothe Correctional Center in Missouri between June 2021 and October 2018. Ms. Dean's allegations against the same Defendant are consistent with and establish proof of the claims of the Plaintiffs the instant case pursuant to FRE 415.

6. Ms. Dean's testimony is, therefore, relevant and necessary to this lawsuit.

WHEREFORE, Plaintiff respectfully requests that the Clerk of the Court be directed to issue a certified Writ of Habeas Corpus Ad Testificandum commanding the Missouri Department of Corrections at Chillicothe Correctional Center, Warden Chris McBee, to produce Teri Dean, Inmate ID 1153665, in the United States District Courthouse in Kansas City, Missouri, on January 31, 2022, and continuing for such time as necessary.

Respectfully submitted,

/s/ Susan McGraugh

Susan McGraugh

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Writ of Habeas Corpus Ad Testificandum has been served upon Counsel of Record by means of electronic email this 11th day of December, 2021.

/s/ Susan McGraugh

Susan McGraugh,
Mo. #37430